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# AUSTRALIAN ARCHAEOLOGICAL ASSOCIATION INCORPORATED

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14 January 2018

The Honourable Ian Hunter MLC  
Minister for Sustainability, Environment, and Conservation  
C/o Kangaroo Island Regional Director Damian Miley  
PO Box 39  
Kingscote SA 5223

Re: Consideration of waterfront Crown land at Pelican Lagoon, Kangaroo Island

Dear Minister,

I write to you on behalf of the Australian Archaeological Association, our nation's leading archaeological organisation with more than 600 members. It has come to our attention of the SA Government's proposal to dispose of waterfront Crown Land at Pelican Lagoon, Kangaroo Island (Section 507 and Lot 1). I write to your department to express our strong opposition to the disposal of this Crown Land, on the basis that this public land serves an important conservation purpose for preserving the ancient archaeological record of Kangaroo Island and it an important asset to the greater Australian public.

A registered archaeological site exists in the boundaries the proposed land for sale. Our reading of a 2016 Public Environmental Report (PER) on adjacent land indicates that this site has not been professionally assessed or described in modern times, and its significance is unknown. The PER further indicates that site is positioned in a coastal dune landform, and although the PER does not include a survey of the surrounding coastal Crown Lands, it does conclude that coastal sand dunes have 'extremely high risk' of containing Aboriginal archaeological sites. Around Australia, coastal sand dunes have potential to bury and preserve archaeological deposits and cultural debris that inform us of our country's ancient Aboriginal past, including stone artefacts, wooden tools, campfire hearths, structures, botanical goods, and faunal remains. Occasionally, burials have been encountered in coastal dunes, as evidenced in the Coorong National Park and Yorke Peninsula of South Australia.

The Aboriginal archaeology of Kangaroo Island is unique by national standards, and it is an important chapter in our nations long Aboriginal history. Researchers and members of the public are captivated by questions of the island's early Aboriginal inhabitants, such as "what happened to the original Kangaroo Islanders 3000 years ago?" "Why are the stone artefacts on Kangaroo Island different than the mainland?" "When was the region first occupied...long before it became an island?" "What was day-to-day life like for the early Kangaroo Islanders?" "In what way the early islanders genetically related to their mainland contemporaries?"

Archaeological sites and materials preserved in the Crown Lands can assist with these questions, which in the context of Kangaroo Island have not be fully answered. We believe Crown Lands can ensure these archaeological places are preserved for future generations of Australians that may one day have the technologies and means to investigate the island's enigmatic past.

Based on the available information, our organisation suggests it is reasonable that the waterfront Crown Land and adjacent parcels of coastal Crown Land have high potential of containing significant archaeological materials, and the land serves and

important public purpose for preserving our nation's Aboriginal heritage, and as such, the land should not be declared "surplus" nor disposed of to any private individual, corporation or development. Moreover, the lack of a comprehensive and thorough survey to assess the archaeological significance of the registered site and the entirety of the surrounding Crown Lands offers no means to accurately measure and qualify the land as "surplus." Therefore, the current zoning and use of the waterfront Crown Land as coastal reserve is appropriate to the Australian public, and we strongly oppose the disposal of the land to the private sector.

Thank you for your time,

A handwritten signature in black ink, appearing to read "Michael Slack", written in a cursive style.

Dr Michael Slack  
President Australian Archaeological Association